Table 2. Annual Federal Government Burden and Cost of Recordkeeping and Reporting Requirements of the New Source Performance Standards for Small MWC Units Subject to Subpart AAAA

Burden Item	(A) Number of Occurrences Per Year (a)		(B) EPA Hours Per Occurrence	(C) Tech Hours Per Year @ $40 (C=AxB)	(D) Management Hours Per Year @ $59 (D=Cx0.05)	(E) Clerical Hours Per Year @ $18 (E=Cx0.1)	(F) EPA Cost Per Year (b)
1. Applications	not applicable						
2. Read and Understand Rule Requirements	1	c	40	40	2	4	$1,718
3. Required Activities							
A. Observe initial performance tests							
1) Initial performance tests and test reports (PM, dioxins/furans,							
opacity, fugitives, HCl, Cd, Pb, Hg)	1	cd	48	48	2	5	$2,062
2) Repeat of Initial performance tests	1	ce	10	10	1	1	$430
B. Excess emissions -- Enforcement Activities	1	g	24	24	1	2	$1,031
C. Create Information							
D. Gather Information							
E. Report Reviews							
1) Review preliminary and final material separation plans and siting analysis	3	c	8	24	1	2	$1,031
2) Review notification of construction	3	c	2	6	0	1	$258
3) Review notification of startup	3	c	2	6	0	1	$258
4) Review notification of initial performance test	6	c	8	48	2	5	$2,062
5) Review notification of initial CEMS demonstration	6	c	4	24	1	2	$1,031
6) Review initial performance test report	6	c	40	240	12	24	$10,309
7) Review initial CEMS demonstration report	6	c	40	240	12	24	$10,309
8) Review annual compliance test report	3	f	40	120	6	12	$5,154
9) Review semi-annual excess emission report	1	g	16	16	1	2	$687
F. Prepare annual summary report	1		200	200	10	20	$8,591
5. Travel expenses: (1 person * 30 hours per year / 8 hours per day * $75 per diem) + ($600 per round trip) =			$881	per trip			$12,338
TOTAL:			1763	1446	72	145	$74,448

	Total Hours	Tech. Hours	Mgt. Hours	Clerical Hours	Labor Costs
Year 1:	317	276	14	28	$11,855
Year 2:	595	517	26	52	$28,375.45
Year 3:	673	585	29	59	$31,296.26
Total:	1,585	1,378	69	138	$71,527

a Assumes 6 affected units at 3 plant startups over the next three years of the NSPS (ie 1 plant with 2 MWC startups each year).

b Figures may not add exactly due to rounding.

c One-time only costs.

d Assumes EPA personnel attend about 8 percent of tests (6 units tested x 8% attended = 1).

e Assumes a 20% failure rate and that EPA personnel attend 10% of the retests (6 plants tested * 20% failure * 10% retests attended = 1).

f Burden not incurred until second year of operation, 1 plant will submit report in years 2 and 3. Second plant submits report in year 3.

g Assumes 2 pollutants are reported twice per year by 20% of reporting plants (3 plants x 20% x 2 = 1.2 = 1).

Table 1. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of the New Source Performance Standards for Small MWC Units Subject to Subpart AAAA - Year 6

Burden Item	(A) Hours Per Occurrence (Technical hours)	(B) Number of Occurrences Per Respondent Per Year	Emissions Testing Costs/ Consulting Costs Per Occurrence	(C) Emission Testing Labor Hours	(D) Hours Per Respondent Per Year (D=A x B)	(E) Number of Respondents Per Year (a)	(F) Technical Hours Per Year @$57 (DxE)	(G) Management Hours Per Year @$87 (F x 0.05)	(H) Clerical Hours Per Year @$36 (F x 0.1)	(I) Total Labor Costs Per Year (b)	(J) Total Non-Labor Costs Per Year	(K) Total Emission Testing Labor Hours (K=B x C x E)	Footnotes
1. Applications	Not applicable												
2. Surveys and Studies	Not applicable												
3. Reporting Requirements													
A. Read and Understand Rule Requirements	40	1	$0	0	40	1	40	2	4	$2,604	$0	0	cd
B. Required Activities													
1) Initial performance tests and reports (PM, dioxins/furans, opacity, fugitives, HCl, Cd, Pb, Hg)	24	1	$48,500	744	24	2	48	2	5	$3,124	$97,000	1488	ce
2) CEMS demonstration (SO2, NOx, opacity, CO, CO2, O2)													
a) Installation of CEM units	24	1	$100,000	200	24	2	48	2	5	$3,124	$200,000	400	c
b) Initial demonstration	24	1	$37,200	430	24	2	48	2	5	$3,124	$74,400	860	c
3) Annual performance tests and test reports (PM, dioxins/furans, opacity, fugitives, HCl, Cd, Pb, Hg)	24	1	$48,500	744	24	10	240	12	24	$15,621	$485,000	7440	e
4) Quarterly Appendix F audits of CEMS (SO2, NOx, CO)													
a) RATA audit (one per year)	8	1	$37,200	342	8	10	80	4	8	$5,207	$372,000	3420	f
b) RAA audit (three per year)	8	3	$8,925	126	24	10	240	12	24	$15,621	$267,750	3780	f
c) Daily calibration and operation	365	1	$40,150	0	365	10	3,650	183	365	$237,569	$401,500	0	
C. Create Information	Included in 3.B												
D. Gather Information	Included in 3.E												
E. Report Preparation													
1) Plant startup													
a) Preliminary and final material separation plans and siting analysis	270	1	$0	0	270	1	270	14	27	$17,574	$0	0	cd
b) Public meeting and comment response	140	1	$0	0	140	1	140	7	14	$9,112	$0	0	cd
c) Notification of construction	2	1	$0	0	2	1	2	0	0	$130	$0	0	cd
d) Notification of startup	2	1	$0	0	2	1	2	0	0	$130	$0	0	cd
2) Notification of initial performance tests	4	1	$0	0	4	1	4	0	0	$260	$0	0	cd
3) Initial compliance reports	40	1	$0	0	40	2	80	4	8	$5,207	$0	0	c
4) Notification of CEMS demonstration	4	1	$0	0	4	2	8	0	1	$521	$0	0	c
5) Initial CEMS demonstration report	40	1	$0	0	40	2	80	4	8	$5,207	$0	0	c
6) Annual compliance reports	40	1	$0	0	40	5	200	10	20	$13,018	$0	0	d
7) Semi-annual excess emission reports	40	2	$0	0	80	4	320	16	32	$20,828	$0	0	

Table 1 (continued). Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of the New Source Performance Standards for Small MWC Units Subject to Subpart AAAA - Year 6

Burden Item	(A) Hours Per Occurrence (Technical hours)	(B) Number of Occurrences Per Respondent Per Year	Emissions Testing Costs/ Consulting Costs Per Occurrence	(C) Emission Testing Labor Hours	(D) Hours Per Respondent Per Year (D=A x B)	(E) Number of Respondents Per Year (a)	(F) Technical Hours Per Year @$57 (DxE)	(G) Management Hours Per Year @$87 (F x 0.05)	(H) Clerical Hours Per Year @$36 (F x 0.1)	(I) Total Labor Costs Per Year (b)	(J) Total Non-Labor Costs Per Year	(K) Total Emission Testing Labor Hours (K=B x C x E)	Footnotes
4. Recordkeeping Requirements													
A. Read Instructions	Included in 3.A												
B. Plan Activities	Included in 3.B												
C. Implement Activities	Included in 3.B												
D. Develop Record System	Not applicable												
E. Record information													
1) Record startups, shutdowns, and malfunctions	4	47	$0	0	188	10	1,880	94	188	$122,365	$0	0	g
2) Records of all emission rates, computations, tests	4	47	$0	0	188	10	1,880	94	188	$122,365	$0	0	g
3) Records of employee review of operations manual	4	1	$0	0	4	5	20	1	2	$1,302	$0	0	
4) Record amount of sorbent used for Hg and dioxin/furan control	4	47	$0	0	188	5	940	47	94	$61,182	$0	0	h
F. Personnel Training	Not applicable												
G. Time for audits	Not applicable												
TOTAL:							10,220	511	1,022	$665,194	$1,897,650	17,388	

	Total Hours	Labor	Non-Labor	Total	Emission Labor
Summary of Respondent Burden	11,753	$665,194	$1,897,650	$2,562,844	17,388
Annualized Capital and Startup	886	$50,117	$371,400	$421,517	2,748
O & M Summary	10,868	$615,077	$1,526,250	$2,141,327	14,640

a Assumes 6 affected units at 3 plant startups over the next three years of the NSPS (ie 1 plant with 2 MWC startups each year).

b Costs are based on the following hourly rates: technical at $57.12 management at $86.81, and clerical at $36.27. Cost figures are based on actual values from columns (F), (G), and (H) actual values from columns (F), (G), and (H) rather than rounded values as shown in columns (E), (F), and (G) and thus may not be equal to the product of the rounded figures presented in this table.

c One-time only costs.

d Cost incurred by a plant regardless of the number of affected units at the plant.

e Cd, Pb, and Hg are tested and reported together.

f RATA audits are performed for one of the four quarterly audits. RAA tests are performed for three of the four quarterly audits. Audits of the diluent monitor (O2 or CO2) are not required because tests on SO2 and CO monitors will incorporate the use of the diluent monitor.

g Based on weekly recordkeeping. Assumes 47 weeks of operation (90% availability) per year per MWC.

h Based on quarterly calculation of sorbent use for entire plant, regardless of the number of affected units at the plant.

Table 1. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of the New Source Performance Standards for Small MWC Units Subject to Subpart AAAA - Year 5

Burden Item	(A) Hours Per Occurrence (Technical hours)	(B) Number of Occurrences Per Respondent Per Year	Emissions Testing Costs/ Consulting Costs Per Occurrence	(C) Emission Testing Labor Hours	(D) Hours Per Respondent Per Year (D=A x B)	(E) Number of Respondents Per Year (a)	(F) Technical Hours Per Year @$57 (DxE)	(G) Management Hours Per Year @$87 (F x 0.05)	(H) Clerical Hours Per Year @$36 (F x 0.1)	(I) Total Labor Costs Per Year (b)	(J) Total Non-Labor Costs Per Year	(K) Total Emission Testing Labor Hours (K=B x C x E)	Footnotes
1. Applications	Not applicable												
2. Surveys and Studies	Not applicable												
3. Reporting Requirements													
A. Read and Understand Rule Requirements	40	1	$0	0	40	1	40	2	4	$2,604	$0	0	cd
B. Required Activities													
1) Initial performance tests and reports (PM, dioxins/furans, opacity, fugitives, HCl, Cd, Pb, Hg)	24	1	$48,500	744	24	2	48	2	5	$3,124	$97,000	1488	ce
2) CEMS demonstration (SO2, NOx, opacity, CO, CO2, O2)													
a) Installation of CEM units	24	1	$100,000	200	24	2	48	2	5	$3,124	$200,000	400	c
b) Initial demonstration	24	1	$37,200	430	24	2	48	2	5	$3,124	$74,400	860	c
3) Annual performance tests and test reports (PM, dioxins/furans, opacity, fugitives, HCl, Cd, Pb, Hg)	24	1	$48,500	744	24	8	192	10	19	$12,497	$388,000	5952	e
4) Quarterly Appendix F audits of CEMS (SO2, NOx, CO)													
a) RATA audit (one per year)	8	1	$37,200	342	8	8	64	3	6	$4,166	$297,600	2736	f
b) RAA audit (three per year)	8	3	$8,925	126	24	8	192	10	19	$12,497	$214,200	3024	f
c) Daily calibration and operation	365	1	$40,150	0	365	8	2,920	146	292	$190,056	$321,200	0	
C. Create Information	Included in 3.B												
D. Gather Information	Included in 3.E												
E. Report Preparation													
1) Plant startup													
a) Preliminary and final material separation plans and siting analysis	270	1	$0	0	270	1	270	14	27	$17,574	$0	0	cd
b) Public meeting and comment response	140	1	$0	0	140	1	140	7	14	$9,112	$0	0	cd
c) Notification of construction	2	1	$0	0	2	1	2	0	0	$130	$0	0	cd
d) Notification of startup	2	1	$0	0	2	1	2	0	0	$130	$0	0	cd
2) Notification of initial performance tests	4	1	$0	0	4	1	4	0	0	$260	$0	0	cd
3) Initial compliance reports	40	1	$0	0	40	2	80	4	8	$5,207	$0	0	c
4) Notification of CEMS demonstration	4	1	$0	0	4	2	8	0	1	$521	$0	0	c
5) Initial CEMS demonstration report	40	1	$0	0	40	2	80	4	8	$5,207	$0	0	c
6) Annual compliance reports	40	1	$0	0	40	4	160	8	16	$10,414	$0	0	d
7) Semi-annual excess emission reports	40	2	$0	0	80	3	240	12	24	$15,621	$0	0	

Table 1 (continued). Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of the New Source Performance Standards for Small MWC Units Subject to Subpart AAAA - Year 5

Burden Item	(A) Hours Per Occurrence (Technical hours)	(B) Number of Occurrences Per Respondent Per Year	Emissions Testing Costs/ Consulting Costs Per Occurrence	(C) Emission Testing Labor Hours	(D) Hours Per Respondent Per Year (D=A x B)	(E) Number of Respondents Per Year (a)	(F) Technical Hours Per Year @$57 (DxE)	(G) Management Hours Per Year @$87 (F x 0.05)	(H) Clerical Hours Per Year @$36 (F x 0.1)	(I) Total Labor Costs Per Year (b)	(J) Total Non-Labor Costs Per Year	(K) Total Emission Testing Labor Hours (K=B x C x E)	Footnotes
4. Recordkeeping Requirements													
A. Read Instructions	Included in 3.A												
B. Plan Activities	Included in 3.B												
C. Implement Activities	Included in 3.B												
D. Develop Record System	Not applicable												
E. Record information													
1) Record startups, shutdowns, and malfunctions	4	47	$0	0	188	8	1,504	75	150	$97,892	$0	0	g
2) Records of all emission rates, computations, tests	4	47	$0	0	188	8	1,504	75	150	$97,892	$0	0	g
3) Records of employee review of operations manual	4	1	$0	0	4	4	16	1	2	$1,041	$0	0	
4) Record amount of sorbent used for Hg and dioxin/furan control	4	47	$0	0	188	4	752	38	75	$48,946	$0	0	h
F. Personnel Training	Not applicable												
G. Time for audits	Not applicable												
TOTAL:							8,314	416	831	$541,137	$1,592,400	14,460	

	Total Hours	Labor	Non-Labor	Total	Emission Labor
Summary of Respondent Burden	9,561	$541,137	$1,592,400	$2,133,537	14,460
Annualized Capital and Startup	886	$50,117	$371,400	$421,517	2,748
O & M Summary	8,676	$491,020	$1,221,000	$1,712,020	11,712

a Assumes 6 affected units at 3 plant startups over the next three years of the NSPS (ie 1 plant with 2 MWC startups each year).

b Costs are based on the following hourly rates: technical at $57.12 management at $86.81, and clerical at $36.27. Cost figures are based on actual values from columns (F), (G), and (H) actual values from columns (F), (G), and (H) rather than rounded values as shown in columns (E), (F), and (G) and thus may not be equal to the product of the rounded figures presented in this table.

c One-time only costs.

d Cost incurred by a plant regardless of the number of affected units at the plant.

e Cd, Pb, and Hg are tested and reported together.

f RATA audits are performed for one of the four quarterly audits. RAA tests are performed for three of the four quarterly audits. Audits of the diluent monitor (O2 or CO2) are not required because tests on SO2 and CO monitors will incorporate the use of the diluent monitor.

g Based on weekly recordkeeping. Assumes 47 weeks of operation (90% availability) per year per MWC.

h Based on quarterly calculation of sorbent use for entire plant, regardless of the number of affected units at the plant.

Table 1. Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of the New Source Performance Standards for Small MWC Units Subject to Subpart AAAA - Year 4

Burden Item	(A) Hours Per Occurrence (Technical hours)	(B) Number of Occurrences Per Respondent Per Year	Emissions Testing Costs/ Consulting Costs Per Occurrence	(C) Emission Testing Labor Hours	(D) Hours Per Respondent Per Year (D=A x B)	(E) Number of Respondents Per Year (a)	(F) Technical Hours Per Year @$57 (DxE)	(G) Management Hours Per Year @$87 (F x 0.05)	(H) Clerical Hours Per Year @$36 (F x 0.1)	(I) Total Labor Costs Per Year (b)	(J) Total Non-Labor Costs Per Year	(K) Total Emission Testing Labor Hours (K=B x C x E)	Footnotes
1. Applications	Not applicable												
2. Surveys and Studies	Not applicable												
3. Reporting Requirements													
A. Read and Understand Rule Requirements	40	1	$0	0	40	1	40	2	4	$2,604	$0	0	cd
B. Required Activities													
1) Initial performance tests and reports (PM, dioxins/furans, opacity, fugitives, HCl, Cd, Pb, Hg)	24	1	$48,500	744	24	2	48	2	5	$3,124	$97,000	1488	ce
2) CEMS demonstration (SO2, NOx, opacity, CO, CO2, O2)													
a) Installation of CEM units	24	1	$100,000	200	24	2	48	2	5	$3,124	$200,000	400	c
b) Initial demonstration	24	1	$37,200	430	24	2	48	2	5	$3,124	$74,400	860	c
3) Annual performance tests and test reports (PM, dioxins/furans, opacity, fugitives, HCl, Cd, Pb, Hg)	24	1	$48,500	744	24	6	144	7	14	$9,373	$291,000	4464	e
4) Quarterly Appendix F audits of CEMS (SO2, NOx, CO)													
a) RATA audit (one per year)	8	1	$37,200	342	8	6	48	2	5	$3,124	$223,200	2052	f
b) RAA audit (three per year)	8	3	$8,925	126	24	6	144	7	14	$9,373	$160,650	2268	f
c) Daily calibration and operation	365	1	$40,150	0	365	6	2,190	110	219	$142,542	$240,900	0	
C. Create Information	Included in 3.B												
D. Gather Information	Included in 3.E												
E. Report Preparation													
1) Plant startup													
a) Preliminary and final material separation plans and siting analysis	270	1	$0	0	270	1	270	14	27	$17,574	$0	0	cd
b) Public meeting and comment response	140	1	$0	0	140	1	140	7	14	$9,112	$0	0	cd
c) Notification of construction	2	1	$0	0	2	1	2	0	0	$130	$0	0	cd
d) Notification of startup	2	1	$0	0	2	1	2	0	0	$130	$0	0	cd
2) Notification of initial performance tests	4	1	$0	0	4	1	4	0	0	$260	$0	0	cd
3) Initial compliance reports	40	1	$0	0	40	2	80	4	8	$5,207	$0	0	c
4) Notification of CEMS demonstration	4	1	$0	0	4	2	8	0	1	$521	$0	0	c
5) Initial CEMS demonstration report	40	1	$0	0	40	2	80	4	8	$5,207	$0	0	c
6) Annual compliance reports	40	1	$0	0	40	3	120	6	12	$7,811	$0	0	d
7) Semi-annual excess emission reports	40	2	$0	0	80	2	160	8	16	$10,414	$0	0	

Table 1 (continued). Annual Respondent Burden and Cost of Recordkeeping and Reporting Requirements of the New Source Performance Standards for Small MWC Units Subject to Subpart AAAA - Year 4

Burden Item	(A) Hours Per Occurrence (Technical hours)	(B) Number of Occurrences Per Respondent Per Year	Emissions Testing Costs/ Consulting Costs Per Occurrence	(C) Emission Testing Labor Hours	(D) Hours Per Respondent Per Year (D=A x B)	(E) Number of Respondents Per Year (a)	(F) Technical Hours Per Year @$40 (DxE)	(G) Management Hours Per Year @$59 (F x 0.05)	(H) Clerical Hours Per Year @$18 (F x 0.1)	(I) Total Labor Costs Per Year (b)	(J) Total Non-Labor Costs Per Year	(K) Total Emission Testing Labor Hours (K=B x C x E)	Footnotes
4. Recordkeeping Requirements													
A. Read Instructions	Included in 3.A												
B. Plan Activities	Included in 3.B												
C. Implement Activities	Included in 3.B												
D. Develop Record System	Not applicable												
E. Record information													
1) Record startups, shutdowns, and malfunctions	4	47	$0	0	188	6	1,128	56	113	$73,419	$0	0	g
2) Records of all emission rates, computations, tests	4	47	$0	0	188	6	1,128	56	113	$73,419	$0	0	g
3) Records of employee review of operations manual	4	1	$0	0	4	3	12	1	1	$781	$0	0	
4) Record amount of sorbent used for Hg and dioxin/furan control	4	47	$0	0	188	3	564	28	56	$36,709	$0	0	h
F. Personnel Training	Not applicable												
G. Time for audits	Not applicable												
TOTAL:							6,408	320	641	$417,081	$1,287,150	11,532	

	Total Hours	Labor	Non-Labor	Total	Emission Labor
Summary of Respondent Burden	7,369	$417,081	$1,287,150	$1,704,231	11,532
Annualized Capital and Startup	886	$50,117	$371,400	$421,517	2,748
O & M Summary	6,484	$366,963	$915,750	$1,282,713	8,784

a Assumes 6 affected units at 3 plant startups over the next three years of the NSPS (ie 1 plant with 2 MWC startups each year).

b Costs are based on the following hourly rates: technical at $57.12 management at $86.81, and clerical at $36.27. Cost figures are based on actual values from columns (F), (G), and (H) actual values from columns (F), (G), and (H) rather than rounded values as shown in columns (E), (F), and (G) and thus may not be equal to the product of the rounded figures presented in this table.

c One-time only costs.

d Cost incurred by a plant regardless of the number of affected units at the plant.

e Cd, Pb, and Hg are tested and reported together.

f RATA audits are performed for one of the four quarterly audits. RAA tests are performed for three of the four quarterly audits. Audits of the diluent monitor (O2 or CO2) are not required because tests on SO2 and CO monitors will incorporate the use of the diluent monitor.

g Based on weekly recordkeeping. Assumes 47 weeks of operation (90% availability) per year per MWC.

h Based on quarterly calculation of sorbent use for entire plant, regardless of the number of affected units at the plant.